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NOV 26 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

Re: Petition for Rule Making
Amendment of FM Table of Allotments
Brazil and Saencer. Indiana

Dear Ms. Dortch:

Transmitted herewith are an original and four copies of a "Joint Petition for Rule Making," submitted by Crossroads Investments, LLC, licensee of WSDM-FM, Brazil, Indiana, and Mid-America Radio of Indiana, Inc., licensee of WSKT(FM), Spencer, Indiana, which seeks modification of the FM Table of Allotments to exchange FM channels currently allotted to Brazil and Spencer, Indiana

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,



Anne Goodwin Crump
Counsel for Mid-America Radio of Indiana, Inc.

Enclosure

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02-285

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations.
(Brazil and Spencer, Indiana)

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MM Docket No. _____
RM- _____

Directed to: Chief, Media Bureau

JOINT PETITION FOR RULE MAKING

Crossroads Investments, LLC ("Crossroads"), licensee of WSDM-FM, Brazil, Indiana, and Mid-America Radio of Indiana ("Mid-America"), licensee of WSKT(FM), Spencer, Indiana, (together, "Joint Petitioners"), hereby respectfully request that the Commission amend Section 73.202(b) of its Rules, the FM Table of Allotments, to substitute Channel 224A for Channel 249A at Brazil, Indiana, and modify the license for WSDM-FM accordingly, and to substitute Channel 249A for Channel 224A at Spencer, Indiana, and to modify the license for WSKT(FM) accordingly. With respect thereto, the following is stated:

1. In essence, Crossroads and Mid-America have entered into an agreement and propose to exchange the channels on which their respective stations operate. The relevant portions of Section 73.202(b) of the Commission's rules would be modified as follows:

	<u>Section 73.606(b)</u>	
	<u>Present</u>	<u>Proposed</u>
Brazil, Indiana	249A	224A
Spencer, Indiana	224A	249A

As set forth in the attached engineering statement, the proposed modified allotments are in compliance with the Commission's technical rules and policies.

2. This proposed channel exchange will provide clear public interest benefits. First, the change in channels will eliminate a grandfathered, short-spaced allotment. At the present time, WSKT(FM) is short-spaced to both WTTS(FM), Bloomington, Indiana, and WJCP(FM), Austin, Indiana. The proposed change from Channel 224A to Channel 249A will eliminate those short-spacings

3. Second, the channel change will allow WSKT(FM) to expand substantially the area and nearly double the population which its station can serve. WSKT(FM) currently is forced to operate with only limited facilities. The station's current license authorizes it to operate with only 1.0kW, at a height above average terrain ("HAAT") of 146meters. As set forth in the attached engineering statement, this combination represents less than the equivalent of 3.0 kW at an HAAT of 100meters. The channel change, however, will allow WSKT(FM) to operate with the equivalent of the class maximum power of 6.0 kW with an HAAT of 100 meters.

4. This increase in power will allow WSKT(FM) to serve a substantially greater area and population. Currently, the WSKT(FM) predicted 60 dBu contour encompasses an area of 1,606.31 square kilometers and a population of 35,410 persons. *See* Exhibit 1. Upon increasing its effective radiated power to the equivalent of the class maximum, however, WSKT(FM)'s

predicted 60 dBu contour will cover 2,610.62 square kilometers and will serve 70,163 persons. This represents a 62.5 percent increase in area covered and a 98.1 percent increase in population served. Furthermore, since no changes in transmitter site are necessary or proposed in order to effectuate the channel exchange, there can be no offsetting loss area.

5. Clearly, therefore, the proposed channel exchange would serve the public interest by providing for both the elimination of a short-spaced allotment and a substantial increase in service to the public. If the channel changes requested herein are adopted by the Commission, Crossroads and Mid-America will each promptly file applications seeking authorizations to implement the changes. In addition, upon authorization of the channel changes, Crossroads and Mid-America will promptly undertake any and all construction or other station modifications necessary to implement the proposed changes.

WHEREFORE, the premises considered, Crossroads and Mid-America hereby respectfully request that Channel 224A be substituted for Channel 249A at Brazil, Indiana, and the license for WSDM-FM be modified accordingly, and that Channel 249A be substituted for Channel 224A at Spencer, Indiana, and the license for WSKT(FM) be modified accordingly. In addition, by signature of its officer below, Crossroads hereby verifies under penalty of perjury that its foregoing statements are true and correct to the best of its knowledge and belief.


Respectfully submitted,

CROSSROADS INVESTMENTS, LLC

By: _____
Michael Peterson
President

CROSSROADS INVESTMENTS, LLC
1301 Ohio Street
Terre Haute, Indiana 47807

MID-AMERICA RADIO OF INDIANA, INC

By: 
Frank R. Jazzo
Anne Goodwin Crump

Its Attorneys

FLETCHER, HEALD & HILDRETH, P.L.C.
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MID: -AM RADIO

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Respectfully submitted,

CROSSROADS INVESTMENTS, LLC

By:


Michael Peterson
President

CROSSROADS INVESTMENTS, LLC
1301 Ohio Street
Terre Haute, Indiana 47807

MID-AMERICA RADIO OF INDIANA, INC.

By:

Frank R. Jazzo
Anne Goodwin Crump

Its Attorneys

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Arlington, Virginia 22209
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**Requested Rule Making
WSDM-FM – WSKT Channel Swap
224 A – 249 A
Brazil and Spencer, Indiana
November 2002**

WSDM-FM, Brazil, Indiana, owned by Crossroads Investments, LLC and WSKT, Spencer, Indiana owned by Mid-America Radio of Indiana, Inc. both desire to swap their class A channels. This swap will allow both stations to be fully spaced and eliminate currently existing grandfathered shortspaces.

Engineering Exhibits 1A and 1B are allocation studies indicating WSDM-FM on proposed Channel 224 A and WSKT on proposed Channel 249 A respectively. All §73.207 spacing requirements are satisfied. Exhibit I C is an allocation study for the present WSKT on Channel 224 A. Please note grandfathered shortages to WTTS, Bloomington, Indiana and WTCP, Austin, Indiana. This proposed change ends these shortages. WSKT is currently authorized to operate with 1 KW ERP from 146 M HAAT. This is an equivalent of less than 3 KW from 100 M HAAT. When this proposed channel swap is authorized, WSKT, from the same location, will be able to operate at class maximum power of 6 KW from 100 M HAAT (or the equivalent thereto).

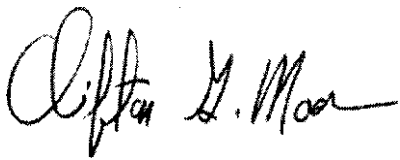
Each station currently covers 100% of their respective city of license with the required 70 dbu contour. The new channels will continue to provide 100% city

grade coverage: no site changes are required and no site changes are proposed herein.

Public interest concerns are the expanded service area and population served by WSKT. After the swap a 6 KW (equivalent) power increase will become possible and area and population gains will be realized. Currently WSKT covers 1,606.31 SQ KM and 35,410 persons. The class maximum WSKT from the same location will cover 2,610.62 SQ KM and 70,163 persons. This is a significant increase of coverage and approximately doubles the population that WSKT currently covers within the 60 dbu.

When ordered to swap channels, Mid-America Radio of Indiana, Inc. and Crossroads Investments, LLC, promises to timely effectuate the channel swap through rapid construction and FCC filings.

All information contained herein is thought to be true and correct to the knowledge of the undersigned.

A handwritten signature in black ink, reading "Clifton G. Moor". The signature is fluid and cursive, with the first name "Clifton" being more prominent and the last name "Moor" following in a similar style.

Clifton G. Moor
Bromo Communications, Inc.

November 13, 2002

Bromo Communications, Inc.
Atlanta, Georgia

WSDM-FM - On Proposed Channel 224 A
Brazil, IN

REFERENCE	CLASS = A	DISPLAY DATES
39 30 43 N	Current	DATA 11-08-02
87 08 19 W	Spacings	SEARCH 11-13-02
----- Channel 224 - 92.7 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Ant	Power	HAAT		
WSKT LIC 224A	Spencer	IN	37.05	140.4	115.0	-77.95
39 15 18	86 51 51	CN	1.000 kW	146 M		
Old Northwest Broadcasting BLH19831031AM						
WSKL LIC 225A	Veedersburg	IN	15.42	339.2	72.0	3.42
40 08 46	87 27 15	C	4.500 kW	82 M		
Zona Communications, Inc. BLH19990714KD						
WKIO LIC 223B1	Urbana	IL	102.34	303.3	96.0	6.34
40 00 45	88 08 29	C	16.000 kW	125 M		
Saga Communications Of Ill BLH20010717AAA						
WSEI LIC 225B	Olney	IL	121.49	222.3	113.0	8.49
38 42 00	88 04 49	CN	50.000 kW	88 M		
V.l.n. Broadcasting, Inc. BMLH19820720AD						
WQTY LIC 227B1	Linton	IN	58.99	200.1	48.0	10.99
39 00 46	87 22 23	CN	12.000 kW	145 M		
The Original Company, Inc. BLH19910408KB						
WTTS LIC 222B	Bloomington	IN	86.06	97.5	69.0	17.06
39 24 27	86 08 52	CN	37.000 kW	332 M		
Sarkes Tarzian, Inc. BLH5889						
WJCP LIC 224A	Austin	IN	139.40	123.0	115.0	24.40
38 49 23	85 41 24	CN	2.000 kW	122 M		
Pieratt Communications, In BLH19940203KC						
WNOU LIC 226B	Indianapolis	IN	101.50	73.3	69.0	32.50
39 46 03	86 00 12	CN	12.500 kW	312 M		
Emmis Radio License Corpor BMLH19910503KB						
WBKR LIC 223C	Owensboro	KY	211.47	178.0	165.0	46.41
37 36 29	87 03 15	CY	100.000 kW	320 M		
Tri-state Broadcasting. In BLH19870121KD						

Engineering Exhibit 1A

WSDM-FM on 224 A

Requested Rule Making
WSDM-FM - WSKT Channel Swap
224 A - 229 A
Brazil and Spencer, Indiana
November 2002

BROMO BROADCAST
TECHNICAL CONSULTANTS
COMMUNICATIONS

Bromo Communications, Inc.
Atlanta, Georgia
WSKT - On Proposed Channel 249 A
Spencer, IN

REFERENCE
39 15 18 N
86 51 51 W

CLASS = A
Current Spacings

DISPLAY DATES
DATA 11-08-02
SEARCH 11-13-02

----- Channel 249 - 97.7 MHz -----

Call N. Lat.	Channel W. Lng.	Location Ant	Power	Dist HAAT	Azi	FCC	Margin
WSDMFH LIC 39 30 43	249A 87 08 19	Brazil CN	6.000 kW	IN 37.05 91 M	320.5	115.0	-77.95
Crossroads Investments, Ll BMLH19960207KD							
WENS LIC 39 40 06	246B 86 01 44	Shelbyville C	23.000 kW	IN 85.28 223 M	57.1	69.0	16.28
Emmis Radio License Corpor BLH19991028ADZ							
WSLMFM LIC 38 38 07	250A 86 10 37	Salem CN	3.000 kW	IN 91.01 100 M	139.0	72.0	19.01
Rebecca L. Coomer BLH19920528KA							
WGNRFH LIC 40 03 43	250B 85 42 34	Anderson CN	50.000 kW	IN 133.59 149 M	47.4	113.0	20.59
The Moody Bible Institute BMLHD19971229KC							
WAMZ LIC 38 03 49	248C1 85 43 52	Louisville CN	100.000 kW	KY 164.98 205 M	143.0	133.0	31.98
Clear Channel Broadcasting BLH19921202KA							
WAMZ,C CP 38 15 40	248C1 85 25 43	Louisville CN	100.000 kW	KY 166.56 203 M	131.1	133.0	33.56
Clear Channel Broadcasting BPK19990607IB							
WHMSFM LIC 40 05 04	248B 88 14 53	Champaign CN	50.000 kW	IL 150.27 109 M	308.3	113.0	37.27
D.W.S., Inc. BLH19911022KB							
WXIR LIC 39 45 33	252A 86 22 30	Plainfield CN	3.000 kW	IN 70.02 91 M	36.7	31.0	39-02
Radio One Five Hundred, In BLH19830131AS							
WRAYFM LIC 38 21 25	251B 87 35 25	Princeton C	50.000 kW	IN 117.97 133 M	212.4	69.0	48.97
Princeton Broadcasting Co. BLH19990528KC							

Engineering Exhibit 1 B

WSKT on 249 A

Requested Rule Making
WSDM-FM - WSKT Channel Swap
224 A - 229 A
Brazil and Spencer, Indiana
November 2002

BROMO
COMMUNICATIONS

BROADCAST
TECHNICAL CONSULTANTS

Bromo Communications, Inc.
Atlanta, Georgia
WSKT - On Current Licensed Channel
Spencer, IN

REFERENCE
39 15 18 N
86 51 51 W

CLASS = A
Current Spacings

DISPLAY DATES
DATA 11-08-02
SEARCH 11-13-02

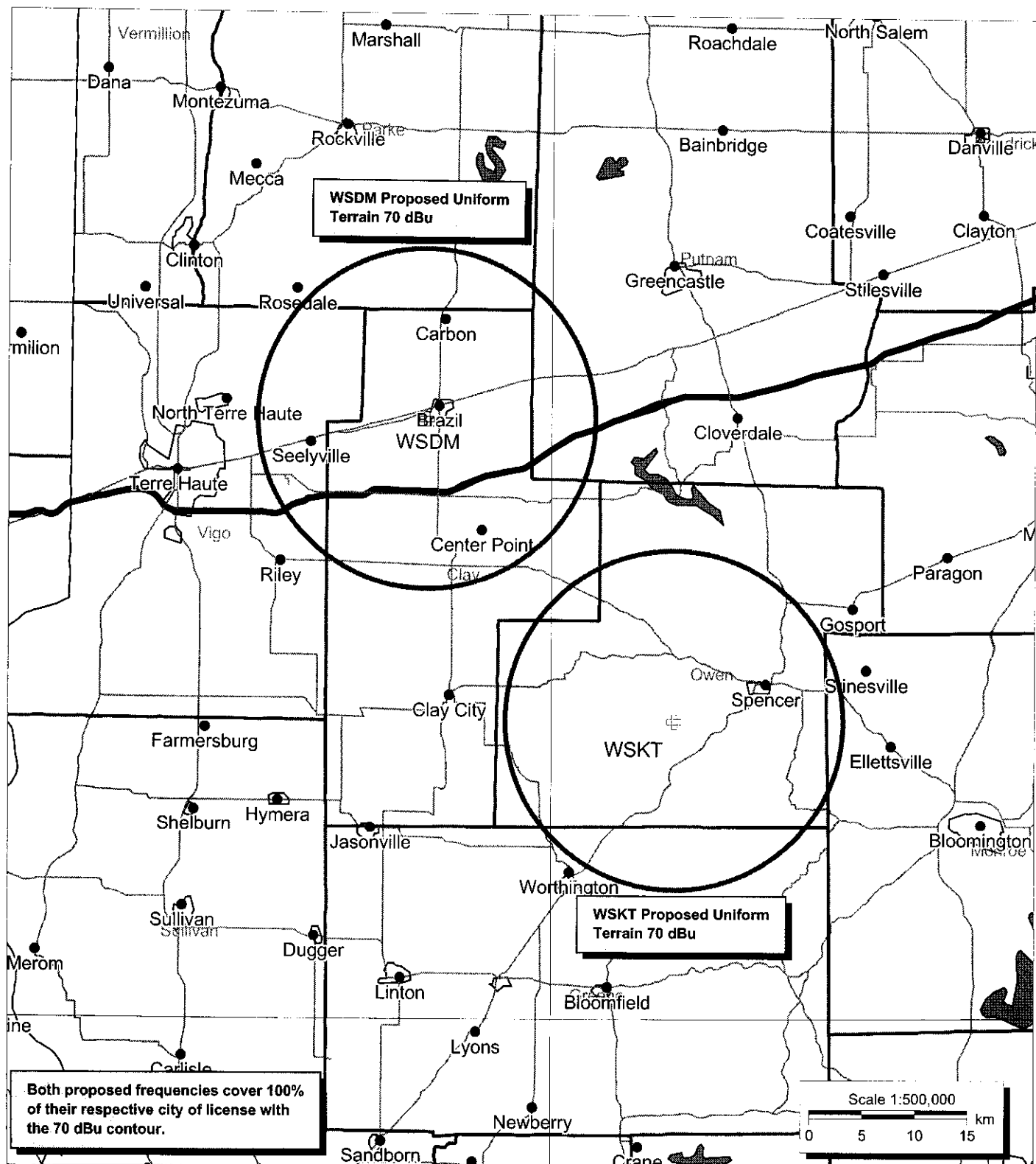
----- Channel 224 - 92.7 MHz -----									
Call	Channel	Location		Dist	Azi	FCC	Margin		
N. Lat.	W. Lng.	Ant	Power		HAAT				
WSKT	LIC 224A	Spencer		IN	0.00	0.0	115.0	-115.00	
39 15 18	86 51 51	CN	1.000 kW		146 M				
Old Northwest Broadcasting			BLH19831031AM						
WJCP	LIC 224A	Austin		IN	104.64	117.0	115.0	-10.36	
38 49 23	85 47 24	CN	2.000 kW		122 M				
Pieratt Communications, In			BLH19940203KC						
WTTS	LIC 222B	Bloomington		IN	64.05	74.4	69.0	-4.95	
39 24 27	86 08 52	CN	37.000 kW		332 M				
Sarkes Tarzian, Inc.			BLH5889						
WQTY	LIC 227B1	Linton		IN	51.57	238.6	48.0	3.57	
39 00 46	87 22 23	CN	12.000 kW		145 M				
The Original Company, Inc.			BLH19910408KB						
WSEI	LIC 225B	Olney		IL	122.07	240.0	113.0	9-07	
38 42 00	88 04 49	CN	50.000 kW		88 M				
V.l.n. Broadcasting, Inc.			BMLH19820720AD						
WBKR	LIC 223C	Owensboro		KY	183.57	185.2	165.0	18.57	
37 36 29	87 03 15	CY	100.000 kW		320 M				
Tri-state Broadcasting, In			BLH19870121KD						
WNOU	LIC 226B	Indianapolis		IN	93.37	52.1	69.0	24.37	
39 46 03	86 00 12	CN	12.500 kW		312 M				
Emmis Radio License Corpor			BMLH19910503KB						
WBKR.C CP -N	223C1	Owensboro		KY	170.13	194.7	133.0	37.13	
37 46 20	87 21 21	NCN	96.000 kW-N		305 M				
Tri-state Broadcasting, In			BPH20010214ACB						
WSKL	LIC 225A	Veedersburg		IN	111.13	333.2	72.0	39.13	
40 08 46	87 27 15	C	4.500 kW		82 M				
Zona Communications, Inc.			BLH19990714KD						
WKIO	LIC 223B1	Urbana		IL	138.19	308.0	96.0	42.19	
40 00 45	88 08 29	C	16.000 kW		125 M				
Saga Communications Of Ill			BLH20010717AAA						
WZDM	LIC 221A	Vincennes		IN	80.45	218.1	31.0	49.45	
38 41 02	87 26 08	CN	4.100 kW		122 M				
Old Northwest Broadcasting			BMLH19940818KA						

Engineering Exhibit I C

Exhibit to indicate current grandfathered shortspacings to **WJCP**, Austin, IN and **WTTS**, Bloomington, IN.

Requested Rule Making
WSDM-FM - WSKT Channel Swap
224 A - 229 A
Brazil and Spencer, Indiana
November 2002

BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS



Engineering Exhibit 2
WSDM-FM - WSKT Channel Swap
224 A - 249 A
Brazil and Spencer, Indiana

Bromo Communications, Inc.
 Atlanta, Georgia
 November 2002